

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS

In re
MARIE JEAN-CHARLES,
Debtor

IN PROCEEDINGS UNDER
CHAPTER 13
CASE NO. 18-11619

DEBTOR'S MOTION TO AMEND CHAPTER 13 PLAN

NOW COMES the Debtor, Marie Jean-Charles, in the above captioned Chapter 13 Bankruptcy proceeding and hereby moves this Honorable Court, Pursuant to MLBR 13-10 to allow her to amend her Chapter 13 Plan. As grounds, therefore, the Debtor states as follows:

1. the Debtor, through this Third Amended Pre-Confirmation Chapter 13 Plan, is, consistent with the Stipulation Resolving the Objection of Debtor to the Proof of Claim of Ditech Financial, LLC, implementing the terms of said Stipulation by amending the prior plan to include the agreed-upon mortgage arrears figure of \$2,188.96 owed to Ditech Financial, LLC, as servicer for Citizens Bank, N.A; and
2. A review of the claims filed indicate that, other than the secured claims of Ditech Financial, LLC, as servicer for Citizens Bank, N.A. and Selene Finance, L.P. as servicer for MTGLQ Investors, L.P., no other creditor has filed a proof of claim in this case, and hence, the prior dividend for the payment of general unsecured creditors has been removed from the Debtor's Third Amended Plan;